

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Protection and Advocacy for People with  
Disabilities, Inc.,

Plaintiff,

v.

James Alton Cannon, Jr., in his official  
capacity as Charleston County Sheriff, Mitch  
Lucas, in his official capacity as Assistant  
Charleston County Sheriff, Willis Beatty, in  
his official capacity as Chief Deputy of  
Charleston County Sheriff's Office, and  
Charleston County School District,

Defendants.

C/A No. 2:20-cv-02738-DCN

**CCSO DEFENDANTS'  
MOTION TO DISMISS**

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COME NOW Defendants Sheriff James Alton Cannon, Jr., Assistant Sheriff Mitch Lucas, and Chief Deputy Willis Beatty, ("CCSO Defendants"), and hereby move pursuant to Fed. R. Civ. P. 12(b)(1) to dismiss this action for lack of subject matter jurisdiction as Plaintiff does not have standing to sue in its own right or on behalf of the juveniles housed at CCJDC. The grounds for this motion are more fully set forth in the accompanying memorandum of law.

*[signatures on following page]*

Respectfully moved,

s/ Sandra J. Senn

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Attorneys for Defendants James Alton Cannon, Jr.,  
Mitch Lucas, and Willis Beatty

August 18, 2020  
Charleston, South Carolina